

such an ardent advocate as GTE Service Corporation ("GTE") concedes, "the Commission has struck a fair balance between producing information needed by CLECs and state commissions while limiting the burden on ILECs."⁴⁸

- provide for broad distribution of performance data to allow for not only sound public policy decisions by regulators, but sound business decisions by existing and potential competitors, as well as the investment community.
- employ statistical analyses to ensure that the performance data provides a meaningful portrayal of the experience of competitive LECs.

Failure to include any of these elements in the measurement and reporting models being developed by the Commission will undermine the effectiveness of the resultant data in revealing incumbent LEC performance in general and the treatment of smaller providers in particular.

III.

CONCLUSION

By reason of the foregoing, the Telecommunications Resellers Association reiterates its support of the Commission's efforts to prompt compliance by incumbent LECs with their statutory obligations to provide competing providers of local exchange service with equivalent access to OSS functionality, as well as operator services and directory assistance, through development of model performance measurements and reporting requirements. TRA urges the Commission to adopt performance measurements and reporting requirements consistent with the above and its earlier-filed comments.

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